

1 Amy F. Sorenson, Esq.
2 Nevada Bar No. 12495
3 Robin E. Perkins, Esq.
4 Nevada Bar No. 9891
5 Jennifer L. McBee, Esq.
6 Nevada Bar No. 9110
7 SNELL & WILMER L.L.P.
8 3883 Howard Hughes Parkway, Suite 1100
9 Las Vegas, NV 89169
10 Telephone: (702) 784-5200
11 Facsimile: (702) 784-5252
12 Email: asorenson@swlaw.com
13 rperkins@swlaw.com
14 jmcbee@swlaw.com

Attorneys for Wells Fargo Bank, N.A.

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SUSAN HUGHES, an individual,

Plaintiff,

VS.

WELLS FARGO NA, a Corporation; US BANK, a Corporation; and DOES I through X inclusive.,

Defendants.

Case No. 2:17-cv-02824

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND TO
COMPLAINT**

(First Request)

STIPULATION

This Stipulation and entered into by and between Defendant Wells Fargo Bank, N.A. (erroneously named as Wells Fargo NA) ("Wells Fargo"), and Plaintiff Susan Hughes ("Plaintiff") (collectively, the "Parties") based on the following:

WHEREAS, Plaintiff filed the Complaint on July 18, 2017 in Clark County District Court, Case No. A-17-758509-C;

WHEREAS, Plaintiff served the Complaint on Wells Fargo on October 9, 2017;

WHEREAS, Wells Fargo filed a Petition for Removal to this Court on November 8, 2017;

WHEREAS, based on the date of filing the Petition for Removal, Wells Fargo's deadline to respond to the Complaint was November 15, 2017;

1 WHEREAS, Wells Fargo seeks an extension of time in which to answer or otherwise
2 respond to Plaintiff's Complaint;

3 WHEREAS, Plaintiff has no objection to extending Wells Fargo's time to respond to the
4 Complaint;

5 WHEREAS, this is the first request for an extension of time to respond to the Complaint
6 and is not intended to cause any delay or prejudice to any party and the extension is requested to
7 allow Wells Fargo and its counsel additional time to evaluate and respond to the allegations set
8 forth in the Complaint.

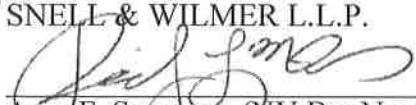
9 NOW, THEREFORE, subject to Court approval, the Parties agree as follows:

10 1. That Wells Fargo shall have until **December 19, 2017** to file its response to
11 Plaintiff's Complaint.

12 **IT IS SO STIPULATED.**

13 DATED this 16th day of November, 2017.

14 SNELL & WILMER L.L.P.

15 
16 Amy F. Sorenson (NV Bar No. 12495)
17 Robin E. Perkins (NV Bar No. 9891)
18 Jennifer L. McBee (NV Bar No. 9110)
19 3883 Howard Hughes Parkway, Suite 1100
20 Las Vegas, NV 89169
21 Telephone: (702) 784-5200
22 Facsimile: (702) 784-5252

23 *Attorneys for Defendant Wells Fargo Bank, N.A.*

13 DATED this 16th day of November, 2017.

14 LAW OFFICE OF MICHAEL J. HARKER

15 /s/ Michael J. Harker
16 Michael J. Harker (NV Bar No. 5353)
17 2901 El Camino Avenue #200
18 Las Vegas, NV 89102
19 Phone: (702) 248-3000
20 Fax: (702) 425-7290

21 *Attorneys for Plaintiff Susan Hughes*

22 ///
23 ///
24 ///
25 ///
26 ///
27 ///
28 ///

ORDER

IT IS HEREBY ORDERED:

1. That the foregoing Stipulation by and between the Parties is approved; and
2. That the deadline for Defendant Wells Fargo Bank, N.A. to file an answer or otherwise respond to Plaintiffs' Complaint shall be **December 19, 2017**.

IT IS SO ORDERED.

Dated: November 16, 2017

Carl Gaddis

UNITED STATES DISTRICT JUDGE

Magistrate

Respectfully submitted by:

SNELL & WILMER L.L.P.

By: *[Signature]*
Amy F. Sorenson (NV Bar No. 12495)
Robin E. Perkins (NV Bar No. 9891)
Jennifer L. McBee (NV Bar No. 9110)
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Telephone: (702) 784-5200
Facsimile: (702) 784-5252
Attorneys for Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2017, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINE TO ANSWER COMPLAINT (First Request)** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I further certify that I have mailed the foregoing document by First-Class Mail, postage fully prepaid, to the following:

Michael J. Harker, Esq.
2901 El Camino Avenue #200
Las Vegas, NV 89102

Attorney for Plaintiff

DATED this 16th day of November 2017.

Dee Math
An Employee of Snell & Wilmer L.L.P.

Snell & Wilmer

LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702.784.5200